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March 9, 2015

VIA ELECTRONIC FILING
 Federal Election Commission
 Attention: Laura Sinram
 Campaign Finance Analyst
 Reports Analysis Division
 999 E Street, NW
 Washington, DC 20463

Dear Ms. Sinram:

V2RD is in receipt of your Request for Additional Information (RAI) dated February 1, 2015, regarding the Pre-Runoff report (10/16/2014 - 11/16/2014) . This statement provides information: 1) regarding the timely filing of certain independent expenditures using disbursements to The Political Network; 2) regarding the itemization for independent expenditure totals related to the Arkansas and Michigan General 2014 election for United States Senator; and, 3) regarding the Calendar Year-To-Date Per Election totals (CYTD totals) reflected for the General 2014 elections for the states: Alaska, Arkansas, Colorado, Iowa, Louisiana, Michigan and North Carolina (referenced by their US postal abbreviations in the interest of space limitations of the FEC Filing Software (FFS)).

The disclosure of the independent expenditures to The Political Network (with the disbursement date 11/10/2014 and dissemination date of 10/29/2014) was made once the committee became aware of the obligation. This vendor's practice is to bill an estimated amount for telephone service minutes and then at the end of the contract bills again for any overage-minutes, if any. The original estimated total, provided by the vendor's experienced staff, for the product and services from this vendor were disclosed in IE notices filed on or about 8/26/2014 and amended on or about 8/29/2014.

After the election, V2RD received the invoice for overage-minutes. When the committee received the invoice, follow up had to be conducted to determine the purpose and allocation for the grand total on the unitemized invoice. Contact with the vendor was attempted over the course of a business day. On 11/11/2014, a telephone conference was held with the vendor to review and invoice and obtain certain details for the disclosure. At the conclusion of the 11/11/2014 call, the vendor promised follow up and provide the requested details on 11/12/2014. Because the consultant who had once managed the relationship with this vendor had recently separated from the V2RD, it took more time than is the usually case for V2RD to adequately research the transactions and obtain the details such as expenditure type and reporting schedule information need in order to accurately report the allocation of the grand total on the invoice.

Once the necessary details were in hand, V2RD filed the IE notices on 11/12/2014. The "dissemination date" is the approximate date that the bank of minutes ran out, and does not represent the dissemination of a newly fashioned communication. These IE transactions were later reported on Pre-Runoff report in keeping with the practices as instructed by FEC's Reports Analysis Division under a similar fact patterns. That said, the descriptions for the transactions have been updated to more clearly indicate that the expenditures were for overage-minutes. An amended Pre-Runoff report has been filed contemporaneously with this statement to provide such descriptions.

The Pre-Runoff report accurately reflects the IE transactions for AR, IA, LA and MI. The IE notice filed for AR on 10/16/2014 (Filing ID FEC-960400) reflects a data operator error that incorrectly names the candidate as Bruce Braley; otherwise, the IE notice originally filed correctly reflects the dissemination date, amount, seat and state information. In similar fashion, the IE notice filed for MI on 10/16/2014 (Filing ID FEC-960405), reflects a data operator error that incorrectly lists the candidate's name as William Cassidy. The MI IE notice as originally filed correctly reflects the dissemination date, amount, seat and state information. Contemporaneously with the filing of this statement, the IE notices for AR and MI filed 10/16/2014 have been amended to correct
